

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

UNITED STATES OF AMERICA, : Case No. CR-1-02-054

Plaintiff, : (Judge Weber)

v. : **MOTION FOR ADDITIONAL
DISCOVERY**

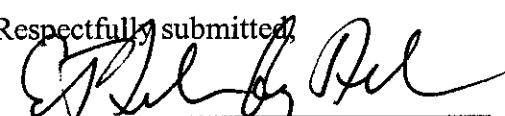
TYREESE DORRAN PUGH, :

Defendant. :

Now comes Defendant, Tyreese D. Pugh, by and through undersigned counsel, and hereby moves this Court for an Order requiring the following additional discovery.

1. Statements of all Co-Defendants;
2. Statements of all witnesses;
3. All evidence favorable to the Defendant including inconsistent statements of any and all witnesses;
4. All photos and videos in possession of the U.S. Attorney or law enforcement office or any governmental entity regardless of whether the prosecution desires to use the evidence at trial.

Respectfully submitted,


 Edward J. Felson (0041988)
 Attorney for Defendant
 36 East Seventh Street, Suite 1650
 Cincinnati, Ohio 45202
 (513) 721-2500

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MEMORANDUM

The Government is required to turn over all of the items listed in the Motion, but has so far refused to do so. This Court should order said discover to be made by the United States.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon Wendy Cross, Assistant U.S. Attorney, 221 East Fourth Street, Suite 400, Cincinnati, Ohio 45202, and Attorney J. Robert Andrews, 2662 Madison Road, Cincinnati, Ohio 45208, by ordinary U.S. mail ~~or hand delivery~~ this 28 day of June, 2002.

ET Felson by EJF
Edward J. Felson (0041988)